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Amentum Services, Inc*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JONATHON HILL, an individual, and
PHILLIP ROWTON, an individual,

Plaintiffs,

vs.

AMENTUM SERVICES, INC., and Does 1-10,

Defendants.

Case No. 2:23-cv-01750-MMD-BNW

**STIPULATION AND ORDER TO
EXTEND TIME FOR DISCOVERY**

(FIRST REQUEST)

Defendant Amentum Services, Inc. (“Defendant”) by and through its counsel, the law firm of Jackson Lewis P.C., and Plaintiffs Jonathon Hill and Phillip Rowton (“Plaintiffs”), by and through their counsel, McCracken, Stemerman & Holsberry, LLP, hereby stipulate and agree to extend the deadline to complete discovery **to October 30, 2024**. This Stipulation is submitted and based upon the following:

1. On October 27, 2023, Plaintiffs filed a Complaint naming Amentum Services, Inc, as Defendant.

2. On October 31, 2023, Plaintiffs served Defendant with a copy of the Summons and Complaint.

3. On January 5, 2024, Defendant filed its Motion to Dismiss Plaintiff's Complaint.

4. On April 1, 2024, the Court denied Defendant's Motion to Dismiss. ECF No. 14. The Court gave the Parties 180 days to complete discovery, to Saturday, September 28, 2024 (September 30, 2024).

5. Amentum's counsel was injured shortly thereafter, requiring an extension of time to answer the complaint. Pursuant to stipulation, Defendant answered on May 1, 2024.

6. Pursuant to Local Rule 26-3, the Parties submit the following statements:

a. **Discovery completed:** The Parties timely completed initial disclosures, and they have served written discovery requests on each other, including requests for production of documents and interrogatories. They have provided extensions on discovery deadlines due to the schedules of counsel. Defendants responded to Plaintiffs' discovery on August 12, 2024, and Plaintiffs' responses are due on September 14, 2024.

b. **Discovery that remains to be completed:** The Parties need additional time to meet and confer regarding the discovery responses and to take depositions. Plaintiffs intend to depose Defendant's 30(b)(6) representative, and Defendant intends to depose Plaintiffs. The Parties are negotiating deposition dates.

c. **Reasons why deadline was not completed:** The Parties have been working diligently to obtain discovery and additional time is needed to complete discovery prior to September 28, 2024, due to the schedules of the parties and counsel in September.

d. **Proposed schedule:**

- i. Discovery cut-off of **October 30, 2024**
- ii. Written discovery completed by September 14, 2024
- iii. Depositions completed by October 14, 2024
- iv. Follow-up completed by October 28, 2024

7. This is the first request for an extension of time to complete discovery and is made more than 21 days in advance of the current discovery cut-off on September 28, 2024.

8. This request is made in good faith and not for the purpose of delay. The Parties have been working diligently to obtain discovery and additional time is needed to complete discovery due to the schedules of the parties and counsel.

DATED this 28th day of August, 2024.

McCracken, Stemerman & Holsberry, LLP

JACKSON LEWIS P.C.

/s/ Sarah Grossman-Swenson

/s/ Paul Trimmer

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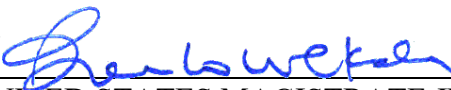
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Attorneys for Plaintiffs

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ORDER

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

Dated: August 29, 2024